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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOSEPH GIULIANO,

Defendant.

Case No. 2:14-cr-371-JCM-DJA

TWENTY-THIRD STIPULATION TO
CONTINUE SENTENCING

The United States of America, through Jason M. Frierson, United States Attorney, and Daniel J. Cowhig, Assistant United States Attorney, and the defendant Joseph Giuliano, by and through his counsel, Shawn R. Perez, Esq., stipulate and agree and jointly move this Honorable Court to vacate the sentencing hearing set for Wednesday, February 7, 2024, at 10:00 a.m. and reset the sentencing proceedings in this matter at a date on or after April 7, 2024.

The parties make this stipulation and motion for good cause and not for the purposes of delay.

This matter is not yet ready for sentencing. The parties request this continuance of approximately 60 days to accommodate filings arising out of other matters. The parties agree

1 that it is in the interest of justice to defer sentencing. Defendant Giuliano believes it is in his best
2 interest to do so.

3 Defendant Giuliano is not in custody and agrees to this continuance.

4 Denial of this request for continuance could result in a miscarriage of justice.

5 This is the twenty-third request to continue sentencing in this matter.

6 The parties respectfully request this Honorable Court issue the attached proposed Order
7 to accomplish these ends.

8 Respectfully submitted this February 1, 2024.

9 Counsel for Defendant
10 JOSEPH GIULIANO

JASON M. FRIERSON
United States Attorney

11 //s// Shawn R. Perez

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DANIEL J. COWHIG

Assistant United States Attorney

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

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ORDER

FINDINGS OF FACT AND CONCLUSIONS OF LAW

Based on the stipulation of the parties and the record in these matters, the Court finds that the parties make this stipulation and motion for good cause and not for the purposes of delay. The parties request this continuance of approximately 60 days because the matter is not yet ready for sentencing and to accommodate filings arising out of other matters. The parties agree that it is in the interest of justice to defer sentencing. Defendant Giuliano believes it is in his best interest to do so. Defendant Giuliano is not in custody. Denial of this request for continuance could result in a miscarriage of justice. This is the twenty-third request to continue sentencing.

ORDER

IT IS HEREBY ORDERED, on the stipulation of the parties and good cause appearing therefor, that the sentencing hearing set for Wednesday, February 7, 2024 at 10:00 a.m. be vacated and reset for **April 10, 2024, at 10:00 a.m.** in Courtroom 6A.

IT IS SO ORDERED February 2, 2024.


THE HONORABLE JAMES C. MAHAN
UNITED STATES DISTRICT JUDGE